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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M 12- 166**

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UNITED STATES OF AMERICA

Filed Under Seal

- against -

COMPLAINT

ION CATALIN VRANCEA,  
also known as  
"Raul Caba,"  
"Iulian Ichim" and  
"Imre Makara,"

(18 U.S.C. § 1543)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

AN LUONG, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

In or about and between August 2011 and September 2011, within the Eastern District of New York and elsewhere, the defendant ION CATALIN VRANCEA, also known as "Raul Caba," "Iulian Ichim" and "Imre Makara," together with others, did knowingly and willfully use or attempt to use a forged, counterfeited, mutilated, or altered passport or instrument purporting to be a passport.

(Title 18, United States Code, Section 1543)

The source of my information and the grounds for my belief are the following:

**BACKGROUND**

1. I have been a Special Agent with the FBI for approximately nine years, and I am presently assigned to Squad C-42, which is responsible for investigating emerging organized criminal groups. Accordingly, I am responsible for conducting and assisting in investigations into the activities of individuals and criminal groups engaged in international organized criminal activity, such as international fraud and identity theft schemes. In my experience, these investigations are often conducted in coordination with other law enforcement agents, including foreign investigating agencies and fellow law enforcement agents based in the United States. I have participated in investigations involving the use of subpoenas to trace identity information and detect fraud, as well as the execution of search warrants and arrest warrants. As a result of my training and experience, I am also familiar with the techniques and methods of operation used by individuals involved in criminal activity to conceal their identities and activities from detection by law enforcement authorities.

2. This affidavit is based in part on my personal

observations, my training and experience and information obtained from other law enforcement agents, including Romanian law enforcement authorities.

3. Except as explicitly set forth below, I have not distinguished herein between facts of which I have personal knowledge and facts as to which I have hearsay knowledge.

4. Because the purpose of this affidavit is limited to demonstrating probable cause, it does not set forth all of my knowledge about this matter. In addition, when I rely on statements made by others, such statements are set forth only in part and in substance unless otherwise indicated.

**PROBABLE CAUSE**

5. As set forth below, there is probable cause to believe that the defendant ION CATALIN VRANCEA is part of an organized criminal group that employs electronic "skimming" devices to steal credit- and debit-card information from unsuspecting victims in Europe, uses that information to withdraw cash from banks in the United States, and then wires the fraudulently obtained money to co-conspirators overseas.

6. Romanian law enforcement authorities have advised that they have been engaged in an investigation of the fraud scheme detailed herein. The Romanian authorities have further advised that the defendant, ION CATALIN VRANCEA, a Romanian national, is a target of their investigation. On July 13, 2010,

an Interpol arrest warrant was issued for VRANCEA charging him with criminal association, counterfeiting of payment instruments, and placing counterfeited payment instruments into circulation.

7. Italian law enforcement authorities have advised that VRANCEA was charged in Milan, Italy, in December 2010 with involvement in a conspiracy to commit credit card fraud. Italian authorities further advised that, based upon their investigation, seven individuals, including VRANCEA, planned to enter the United States and Mexico to begin operations in North America. On January 25, 2011, an Interpol arrest warrant was issued for VRANCEA based upon the Italian charges.

8. On November 23, 2009, prior to the issuance of either of the Interpol warrants referenced above, the defendant, ION CATALIN VRANCEA, was issued a B1/B2 tourist visa to enter the United States. The defendant's visa application listed his name as ION CATALIN VRANCEA, his nationality as Romanian, and included a photograph of the defendant.

9. On March 1, 2011, Customs and Border Protection ("CBP") agents detained VRANCEA, along with eight other individuals, while they were attempting to enter the United States from Mexico without inspection near the Hidalgo, Texas Port of Entry. VRANCEA was thereafter released from custody, but was scheduled to appear in person at the CBP Los Angeles field office on April 14, 2011, as well as for a removal hearing on

November 10, 2011. VRANCEA did not appear on either of those dates. On November 22, 2011, VRANCEA's B1/B2 visa was revoked and an order of removal was thereafter issued.

10. On or about January 16, 2012, Romanian law enforcement authorities intercepted and searched a package sent from Craiova, Romania, via the Romanian Postal Service, to an address in Queens, New York. The mailing label on the package identified the sender as "Maftai Aurel," with a listed address of "Craiova, bl. T5, sc.1, ap.19." The package was addressed to "Iulian Ichim," with a listed address of "USA New York, 45.06. Queens, blvd. nr. 184#, Sunnyside. NY. Zip cod 11104." Inside the package, Romanian agents found a counterfeit Hungarian passport and drivers license in the name "Makara Imre," and bearing photos of the defendant.

11. The address "45-06 Queens Boulevard" corresponds to the location of a United Parcel Service ("UPS") retail store. According to the information obtained from UPS, box number 184 at that store was rented by an individual who presented a Romanian passport bearing the name "Iulian Ichim" and a photograph of an individual law enforcement authorities later identified as the defendant, ION CATALIN VRANCEA.

12. On or about January 23, 2012, pursuant to a Court-authorized search warrant, the undersigned intercepted and searched the above-described package. Inside were several

magazines and a cardboard box containing a digital picture frame. Hidden inside the frame were a counterfeit Hungarian passport and drivers license in the name "Makara Imre," and bearing photos of the defendant.

13. On multiple occasions in August and September 2011, the defendant transferred money, via Western Union, to individuals in China, Germany and Romania. I am advised by a representative of Western Union that in order to initiate a wire transfer in excess of \$1,000, Western Union requires that a customer present photo identification. On each occasion, in order to effectuate the transfer, the defendant presented a Romanian passport, bearing number 12382082 and the name "Raul Caba," along with a photograph of the defendant. For example:

a. According to records obtained from Western Union, on August 25, 2011, an individual presenting the Romanian passport described above - bearing the name "Raul Caba" and a photograph of the defendant - transferred \$2,900 from a Western Union location located at 1440 Broadway, New York, New York, to an individual in Koeln, Germany.

b. On September 19, 2011, surveillance cameras captured the defendant at a Pay-O-Matic location at 4618 Queens Boulevard, Sunnyside, Queens, New York. According to records

obtained from Pay-O-Matic, the defendant presented the same Romanian passport described above, bearing the name Raul Caba, together with the defendant's photograph, and transferred \$2,900 to an individual in Guangzhou, China.

c. According to records obtained from Western Union, on September 20, 2011, an individual presenting the Romanian passport described above - bearing the name "Raul Caba" and a photograph of the defendant - transferred \$2,150 from a Pay-O-Matic location at 56-54 Myrtle Avenue, Ridgewood, Queens, New York to an individual in Guangzhou, China.

d. According to records obtained from Western Union, on September 21, 2011, an individual presenting the Romanian passport described above - bearing the name "Raul Caba" and a photograph of the defendant - transferred \$2,900 from a Western Union location at 2317 Ralph Avenue, Brooklyn, New York to an individual in Bucharest, Romania.

e. On September 23, 2011, surveillance cameras captured the defendant at a Pay-O-Matic location at 45-01 Northern Boulevard, Long Island City, Queens, New York. According to records obtained from Pay-O-Matic, the defendant presented the same Romanian passport described above, bearing the name Raul Caba, together with the defendant's photograph, and transferred \$2,900 to an individual in Brasov, Romania.

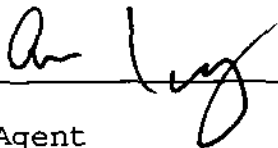
f. According to records obtained from Western Union, on September 27, 2011, an individual presenting the Romanian passport described above - bearing the name "Raul Caba" and a photograph of the defendant - transferred \$2,900 from the same Pay-O-Matic location in Long Island City referenced above to an individual in Craiova, Romania.

SEALING

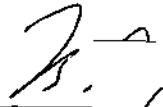
14. I request that this affidavit and an arrest warrant issued in connection therewith be sealed until further order of the Court. Public disclosure of this affidavit prior to VRANCEA's arrest would jeopardize this investigation.

CONCLUSION

WHEREFORE, your deponent respectfully requests that a sealed arrest warrant be issued for the defendant ION CATALIN VRANCEA so that he may be dealt with according to law.

  
\_\_\_\_\_  
AN LUONG  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
15th day of February, 2012

  
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